



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

November 15, 2019

Mr. John Schenkewitz
Manager, Remediation
Hess Corporation
Trenton-Mercer Airport
601 Jack Stephan Way
West Trenton, NJ 08628

RE: Hess Corp – Former Port Reading Refinery
EPA ID No. NJD045445483
Woodbridge Township, Middlesex County
PI #: 006148; Activity Number: RPC000002

Site Investigation Work Plan AOC 103 - Fire Area/Fire Pits Comments

Dear Mr. Schenkewitz:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (Department) have completed their review of the Site Investigation Work Plan AOC 103 – Fire Training Area/Fire Pits, dated May 9, 2019 (and revised September 4, 2019) submitted pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) of 1994 and the NJDEP Technical Requirements for Site Remediation at N.J.A.C. 7:26E. The work plan is acceptable contingent upon that the following comments are addressed. Hess may proceed with the investigations with the understanding that the comments will be addressed as part of the Site Investigation Report to be submitted upon completion of the investigations. If Hess decides that a revised SI work plan will be submitted prior to the implementation of investigations, please provide EPA and NJDEP with the revised plan by Monday December 16, 2019.

Buckeye Aqueous Film Forming Foam (AFFF) Storage: (page 2, page 4) Buckeye stores AFFF in a tanker truck area north of the Administration Building. As the point of contact for the HSWA Permit, Hess will forward EPA's/NJDEP's comments and concerns on the area to Buckeye for its review and response. In addition, Hess will obtain and provide EPA and NJDEP with Buckeye's response to the EPA's/NJDEP's comments and concerns.

Figures 3 and 4 identify the location of monitoring well placements. These locations are acceptable.

Well preclearing using hand auger to a minimum of 6 to 8 feet depth is acceptable. The Department notes that older burn areas may have AFFF as a viscous, honey-like or toothpaste like residual. The presence of such materials may not be observed with air knife/vacuum extraction methods. Subsequently, hand auger preclearing is favored over air knifing/vacuum extraction in order to make borehole observations to assist in data evaluations and future investigation decisions. If air knifing/vacuum extraction is performed, access to drill cuttings as the boring is advanced is recommended for observations of residual burn material/AFFF residue/indicators of COCs.

Figure 3 does not identify the locations of the 2015 SIR soil borings. The revised and amended SIWP submission must either include the boring locations on Figure 3, or include them in the SIR submission.

The proposed well screen interval (Page 4, Paragraph 5) is 3-15' bgs, however the boring log depth to water was generally 3-4.5' bgs. Wells in the burn pits must be screened across the water table and above the meadow mat. The Department agrees with the total well depth of 15 feet bgs or less provided the depth is above the meadow mat/organic silts-clays. Accordingly, well construction may need to be tailored to the depth of the meadow mat bgs at the drainage path and former ponded area. These areas may differ topographically from the burn pit area.

If air knife/vacuum extraction is used, Hess must allow a total of 4 weeks for stabilization after development to allow for attenuation of any effects due to air injection and/or vacuum extraction. Air lift pumping/air surging during well development is not acceptable.

The Department agrees with the ground water analytical parameters (Page 5) of PFOA, PFOS, PFNA by modified EPA 537, TOC, TDS, chloride, VOC+TICs, SVOC+TICs. Hess must report all analytes detected by the modified method 537 although there are only NJ standards for 3 analytes.

The Department agrees with the ground water sampling methods (Page 5) that includes 3 volume purging by peristaltic pump followed by bailer sample collection. Pursuant to the NJDEP FSPM, peristaltic pumps can be used for well purging with the tubing intake set within the top 3' of the water column. Bailer sample collection will also need to be within the top 3' of the water column.

Hess must survey the new wells and submit the drillers well construction record, the Earth Systems geologist boring log, and NJDEP well construction Form A and B documentation in the SIR.

If you have any questions, call me at (212) 637-4184 or email at park.andy@epa.gov or Philip Cole of NJDEP at (609) 292-0395, or email at Phil.Cole@dep.nj.gov.

Sincerely,

Andrew Park

Andrew Park
Base Program Management Section
Land Redevelopment Programs Branch

cc: Philip Cole, NJDEP
Rick Ofsanko, Earth Systems
John Virgie, Earth Systems
Amy Blake, Earth Systems